



Action: *ACAS*  
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**General Aviation  
Manufacturers Association**

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February 1, 1994

Mr. Anthony J. Broderick  
Associate Administrator for  
Regulation & Certification, AVR-1  
Federal Aviation Administration  
800 Independence Avenue SW  
Washington, DC 20591

Dear Mr. Broderick:

This letter is in response to a request from the ARAC ELT Working Group of the Certification Procedures Issues Group.

In fulfilling part of its task, the ARAC ELT Working Group has studied the comments received in response to NPRM 90-11. Upon reviewing the background material of this NPRM, the issues group has concluded that the current ELTs designed to TSO-C91 are unreliable. The following quote from the NPRM is indicative, "Statistics show that only about 3 percent of ELTs involved in accidents activate".

The ELT Working Group recommends that the FAA should establish an effective date(s) and issue NPRM 90-11 as a Final Rule. The working group also recommends that this action be carried out as soon as possible. Further, that this action be taken for the following reasons:

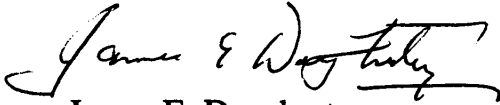
- Three years has elapsed since the comment period of July 31, 1990 closed;
- Future production of ELTs designed to TSO-C91 should be prohibited;
- Maintenance issues are in need of clarification;
- The FAA, in response to several NTSB recommendations, said it would issue the final rule;
- The continued production of ELTs with a 97 percent false alarm rate is unreasonable.

Although NPRM 90-11 does not represent a complete solution (it does not require replacement of the obsolete ELTs with improved ELTs), it does solve some of the more immediate problems: maintenance and withdrawal of manufacturing authority for TSO-C91 ELTs.



This recommendation was endorsed by the ARAC Certification and Procedures Issues Group at its January 28, 1994 meeting, and is respectfully submitted for your consideration and Agency action.

Sincerely,

A handwritten signature in cursive script, appearing to read "James E. Dougherty".

James E. Dougherty  
Chairman  
ARAC Certification Procedures Issues Group

copy J. Schwind, ALPA